

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>HEATHER WATTS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>CASE NO.: 2:06-cv-1149-MEF</b>
	)	
<b>HOSPITALITY VENTURES, LLC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO ADMIT ATTORNEYS PRO HAC VICE**

Comes now Jeffrey A. Lee, a member of the Bar of this Court and an attorney of record for Defendant, Hospitality Ventures, LLC, and moves this Honorable Court to admit attorneys Robert Jason D'Cruz and Daniel S. Fellner *pro hac vice*.

As grounds for this motion, movant states that Mr. D'Cruz is an attorney who regularly practices with the law firm of Morris, Manning & Martin, LLP, at the firm's office located at 1600 Atlanta Financial Center, 3343 Peachtree Road, NE, Atlanta, Georgia 30326. Mr. D'Cruz is a member of the Georgia state bar and the bars for the American Bar Association, Atlanta Bar Association and U.S. District Court for the Northern District of Georgia. Mr. D'Cruz is admitted to practice before the United States District Court for the district (Northern District of Georgia) in which he resides and regularly practices law. Attached is a Certificate of Good Standing for Mr. D'Cruz from the United States District Court for the Northern District of Georgia.

Mr. Fellner is an attorney who regularly practices with the law firm of Morris, Manning & Martin, LLP, at the firm's office located at 1600 Atlanta Financial Center, 3343 Peachtree Road, NE, Atlanta, Georgia 30326. Mr. Fellner is a member of the Georgia state bar and the Florida state bar and for the U.S. District Court for the Northern District of Georgia. Mr. Fellner is admitted to practice before the United States District Court for the district (Northern District of

Georgia) in which he resides and regularly practices law. Attached is a Certificate of Good Standing for Mr. Fellner from the United States District Court for the Northern District of Georgia.

/s/ Jeffrey A. Lee.

Jeffrey A. Lee

Attorney for Defendant Hospitality Ventures, LLC

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.

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Facsimile: (205) 254-1999

**CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2007, I electronically filed the foregoing Motion to Admit Attorneys *Pro Hac Vice* with the Clerk of Court using the CM/ECF system and that the Court's electronic filing system will send notification of such filing to all counsel of record.

Priscilla Black Duncan, Esq

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/s/ Jeffrey A. Lee

Of Counsel



## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF GEORGIA

}  
} ss.  
}

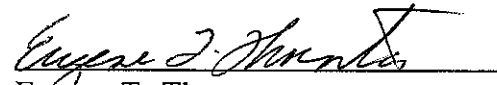
I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

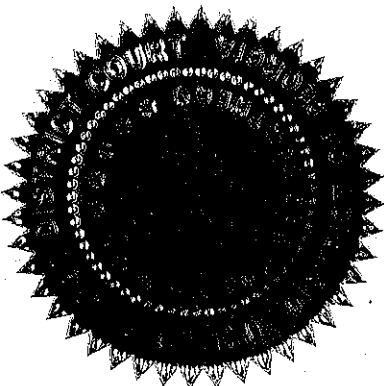
**DO HEREBY CERTIFY** that **ROBERT JASON D'CRUZ, 4740**, was duly admitted to practice in said Court on December 10, 1991 and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 17th day of January, 2007.

JAMES N. HATTEN  
CLERK OF COURT

By:

  
Eugene T. Thornton  
Deputy Clerk





## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF GEORGIA

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I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

DO HEREBY CERTIFY that **DANIEL S. FELLNER, 257795**, was duly admitted to practice in said Court on March 3, 1997 and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 17th day of January, 2007.

JAMES N. HATTEN  
CLERK OF COURT

By:

Eugene T. Thornton  
Deputy Clerk

